

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MILFORD & FORD ASSOCIATES, INC., and
D. MICHAEL COLLINS,

Plaintiffs

v.

CELL-TEK, LLC,

Defendant and Third Party Plaintiff

v.

ERIE INSURANCE EXCHANGE, et al.

Third Party Defendants

C.A. NO. 1:09-CV-11261-DPW

AFFIDAVIT OF ANYA VERKHOVSKAYA

I, Anya Verkhovskaya, being duly sworn, aver as follows:

1. I am the Senior Executive Vice President and Chief Operating Officer of A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data") in Milwaukee, Wisconsin; West Palm Beach, Florida; San Francisco, California; and New York, New York. A.B. Data offers a full range of class action and complex litigation support services. My business address is 600 A.B. Data Drive, Milwaukee, WI 53217. My direct telephone number is 414-961-6441.

2. I submit this Affidavit in connection with the class action notice administration proceedings related to *Milford and Ford Associates, Inc. v. Cell-Tek, LLC*, Civil Action No. 1:09-CV-11261-DPW (the "Action"), pending in the United States District Court for the District of Massachusetts (the "Court"), per the terms of the Order Authorizing Notice of Class Settlement and Conditional Certification of Class and Entry of Scheduling Order (the "Order") and at the request of

Matthew P. McCue, Esq. of The Law Office of Matthew P. McCue and Edward A. Broderick, Esq. of Broderick Law, P.C. (“Class Counsel”).

3. This Affidavit is based upon my personal knowledge and upon information provided by Class Counsel, my associates, and staff.

4. A.B. Data was responsible for the notice administration in this Action per the terms of the Order, the Stipulation of Class Action Settlement (the “Stipulation”) and the request of Class Counsel. This Affidavit details the steps taken to implement notice per the Order including:

- a. Distributing the Class Action Fairness Act (CAFA) Notice to the respective Attorneys General;
- b. Distributing the Notice and Claim Form to all potential Class Members via the United States Postal Service (USPS) by First-Class Mail, postage prepaid;
- c. Disseminating the Notice and Claim Form to all potential Class Members via facsimile transmission;
- d. Website design, publishing, and maintenance;
- e. Establishing a case-specific toll-free telephone line with an interactive voice response (IVR) system and live operators;
- f. Processing Class Member requests for exclusion and objections; and
- g. Claim Form processing.

CAFA NOTICE

5. On March 25, 2011, A.B. Data delivered CAFA Notices to the USPS for delivery to the Attorney General of the United States and the Attorneys General of each state of Class Member location/residence pursuant to the class data.¹ A generic copy of the CAFA notice is attached as Exhibit A.²

1 States of Class Member location/residence were Connecticut, Delaware, the District of Columbia, Georgia, Maine, Maryland, Massachusetts, New Hampshire, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Vermont, and Virginia.

2 Due to unforeseen technical issues, the exhibits referenced herein will be provided prior to the Final Approval Hearing.

DIRECT MAIL NOTICE

6. On or about March 18, 2011, A.B. Data received from Class Counsel the Court-approved Notice and Claim Form documents and formatted them together for printing (the “Notice Packet”).

A copy of the Notice Packet is attached as Exhibit B.

7. On or about March 19, 2011, A.B. Data received from Class Counsel a class data file, which contained class identifying information for 75,205 potential Class Members (the “Class List”). A.B. Data standardized and updated the Class List addresses using NCOA^{Link}, a national database of address changes that is compiled by the USPS.

8. A.B. Data established a mailing address, specifically Cell-Tek Class Action Settlement, Settlement Administrator, c/o A.B. Data, Ltd., Post Office Box 170500, Milwaukee, WI 53217-8042, to receive Claim Forms, exclusion requests, objections, Class Member correspondence, and Notice Packets returned to A.B. Data by the USPS as undeliverable as addressed (UAA).

9. On or about March 30, 2011, A.B. Data caused the Notice Packets to be printed in preparation for mailing. As part of the printing process, each Claim Form was personalized to include the potential Class Member’s organization name, contact person name, address, and fax number as identified on the Class List.

10. On April 6, 2011, A.B. Data caused the Notice Packets to be mailed to the 75,205 potential Class Members from the Class List via the USPS by First-Class Mail, postage prepaid.

11. As of July 29, 2011, 26,965 Notice Packets were returned by the USPS to A.B. Data as UAA; of those returned UAA, 249 had forwarding addresses and were promptly re-mailed.³

³ Because all Class List addresses were checked against the NCOA database and updated accordingly prior to mailing, the records returned as UAA were not checked against the database a second time after being returned.

FACSIMILE NOTICE

12. On or about April 22, 2011, A.B. Data formatted the facsimile version of the Notice Packet (the “Facsimile Notice”). A copy of the Facsimile Notice is attached as Exhibit C.

13. On April 27, 2011, A.B. Data caused the Facsimile Notice to be sent via facsimile transmission to the 75,205 potential Class Members from the Class List. As part of the transmission process, each Claim Form was personalized to include the potential Class Member’s organization name, contact person name, address, and fax number as identified on the Class List.

WEBSITE DESIGN, PUBLISHING, AND MAINTENANCE

14. On or about April 5, 2011, A.B. Data established the case-specific website for this Action, celltekjunkfaxsettlement.com (the “Website”), in addition to a webpage on its website, abdataclassaction.com. The Website and webpage provide general information about the Action, allow potential Class Members to request a Notice Packet, and allow visitors to download the Notice and Stipulation.

15. As of July 29, 2011, the following information relating to Website and webpage activity was recorded:

- a. A total of 3,050 hits have been recorded at the Website;
- b. The Notice was downloaded 1,166 times; and
- c. The Stipulation was downloaded 578 times.

16. The Website and webpage also allow visitors to submit address change requests, written inquiries, and Claim Forms to info@celltekjunkfaxsettlement.com. As of July 29, 2011, a total of 794 emails have been received.

CASE-SPECIFIC TOLL-FREE HELPLINE

17. On or about April 5, 2011, a case-specific toll-free number, 800-331-8642, was established with an IVR system and live operators. The automated attendant answered the calls and

presented callers with a series of choices to respond to basic questions. If callers needed further assistance, they had the option to be transferred to a live operator during business hours.

18. As of July 29, 2011, A.B. Data received 649 telephone calls and 28 voicemail messages. All messages were returned within two business days.

EXCLUSION REQUESTS AND OBJECTIONS

19. Exclusion requests were to be postmarked no later than July 1, 2011. As of July 29, 2011, A.B. Data has received 11 timely exclusion requests. Attached as Exhibit D is a list identifying the individuals who submitted these requests for exclusion. Attached as Exhibit E are the original requests for exclusion.

20. Class Members who object to the approval of the proposed Settlement were to file their written objections with the Court and forward a copy of the objection to A.B. Data postmarked by July 1, 2011. As of August 1, 2011, A.B. Data has received no Class Member objections.

CLAIM FORM PROCESSING

21. Pursuant to the Order, the claims filing deadline was July 1, 2011. Claim Forms were to be mailed to the address outlined in the Notice Packet postmarked no later than July 1, 2011; faxed to the fax number outlined in the Notice Packet no later than midnight, U.S. Eastern Time on July 1, 2011; or forwarded via email to the email address outlined in the Notice Packet no later than midnight, U.S. Eastern Time on July 1, 2011.

22. As of July 29, 2011, A.B. Data has received 12,736 Claim Forms, of which 1,218 were duplicate Claim Forms. Therefore, the total number of valid claims as of July 29, 2011, is 11,518.

23. The present number of Claim Forms received represents a response rate of approximately 15%. This is a high response rate relative to similar previous class actions, which have yielded an approximate 5% response rate.

24. Based on the number of Claim Forms currently received, the presently estimated *pro rata* settlement award distribution per Claim Form is calculated to be approximately \$85.10.⁴

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of August 2011.

/s/ Anya Verkhovskaya

Anya Verkhovskaya

Chief Operating Officer and Senior Executive Vice President

A.B. Data

600 A.B. Data Drive

Milwaukee, WI 53217

⁴ This calculation presumes a service award to Plaintiff Milford & Ford in the amount of \$15,000, payment of a service award to Plaintiff D. Michael Collins in the amount of \$3,000, payment of all costs and expenses of notice and administration of the settlement in the amount of \$201,727.60, and payment of attorneys' fees to Class Counsel in the amount of \$600,000.

Exhibit A

A.B. DATA, LTD.

Class Action Administration



March 25, 2011

«Institution_Name»

«ATTNDepartmentBuilding»

«Address_1»

«Address_2»

«City», «State»«Zip»

Re: Milford & Ford Associates, Inc. and D. Michael Collins v. Cell-Tek, L.L.C., et. al.
United States District Court, District of Massachusetts, Case No: C-09-145917 CN

Dear Sir or Madam:

A.B. Data, Ltd., class action administrator, on behalf of Milford & Ford Associates, Inc., and D. Michael Collins, the Class Plaintiffs in the above-referenced action, hereby provides the following notice pursuant to Section 1715 of the Class Action Fairness Act (28 U.S.C. § 1715). The following are the items of information called for in Section 1715(b).

1. A copy of the Complaint and the Amended Complaint are included electronically on the enclosed disc.
2. The Final Approval Hearing is currently scheduled for August 16, 2011, at 3:30 p.m., before the Honorable Douglas P. Woodlock, in the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210.
3. The Court-approved Notice is enclosed as Exhibit B to the Stipulation of Class Action Settlement (the "Stipulation").
4. The Stipulation in this matter is included electronically on the enclosed disc.
5. There is no other agreement contemporaneously made between class counsel and counsel for the defendants.
6. The Court's opinion preliminarily approving the Stipulation is enclosed.
7. Because it is not feasible to include the names of all class members who reside in each state, enclosed is a reasonable estimate of the number of class members residing in each state and the estimated proportionate share of their claims.

Sincerely,

A.B. Data, Ltd.
Class Action Administrator on
Behalf of Plaintiff

Enclosures

Exhibit B

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MILFORD & FORD ASSOCIATES, INC.,
and D. MICHAEL COLLINS,

Class Action Plaintiffs

v.

C.A. NO. 1:09-CV-11261-DPW

CELL-TEK, LLC,

Defendant and Third-Party Plaintiff

v.

ERIE INSURANCE EXCHANGE, L. STEIN
CO. INC. d/b/a FAXVANTAGE, LEONARD
(LENNY) STEIN, individually, and
UNIXUSA, LLC

Third Party Defendants.

**THIS NOTICE CONCERNS SETTLEMENT OF A CLASS ACTION WHICH MAY ENTITLE
YOU TO RECEIVE A PAYMENT FROM SETTLEMENT FUND**

*By order of the Honorable Douglas P. Woodlock, Judge of the
United States District Court
for the District of Massachusetts*

WHY AM I GETTING THIS NOTICE?

Records obtained in this case indicate that in November of 2007, an unsolicited facsimile advertisement was transmitted to you, or your company, by a company identified as "Cell-Tek," in alleged violation of the federal Telephone Consumer Protection Act (TCPA). If you, or your company, used the facsimile number listed on the first page of the enclosed Claim Form, in November of 2007, you may be entitled to a recovery of up to \$500. To file a claim you need only fill out the enclosed Claim Form and mail, fax or e-mail it back to the identified Settlement Administrator. The deadline to file a claim by mailing back the Claim Form is **July 1, 2011**.

THIS IS NOT NOTICE OF A LAWSUIT AGAINST YOU.

The purpose of this Notice is to advise you of a proposed settlement of a class action lawsuit against Cell-Tek, LLC in the United States District Court for the District of Massachusetts. This Notice describes the case in general and does not address all of the issues in detail. You may review the case file at the office of the Clerk of the Court of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210. You may inspect the file and copy it at your expense, you may contact the Settlement Administrator at the toll-free telephone number 1-800-331-8642, or you may view and download a copy of the Stipulation of Class Action Settlement at CellTekJunkFaxSettlement.com.

WHAT IS THIS LAWSUIT ABOUT?

The lawsuit alleges that Cell-Tek violated the federal Telephone Consumer Protection Act, 47 U.S.C. §227 (“TCPA”), by sending out an unsolicited facsimile advertisement offering its goods or services in November 2007. The case seeks damages for class members consisting of those to whom the fax was allegedly transmitted. Cell-Tek denies that it violated any laws or that it did anything wrong. Cell-Tek has agreed to the settlement solely to avoid the burden, expense, risk and uncertainty of continuing the lawsuit. The Court has preliminarily certified this matter as a class action for settlement and has ordered that Class members be notified of the proposed settlement. Cell-Tek’s records reflect that you may be a Class member. The Class consists of:

All persons or entities within the United States to whom Cell-Tek, in or about November of 2007, sent or caused to be sent the facsimile advertisement identical in substance to the Cell-Tek Fax attached to the Class Complaint.

WHY IS THIS A CLASS ACTION?

In a class action, one or more people or entities, called “class representatives” (in this case, Milford & Ford Associates, Inc. and D. Michael Collins), sue on behalf of people who have similar claims. All of these people together are a “class” or “class members.” The settlement, if approved by the Court, resolves the issues for all members of the Class (the “Settlement Class Members”), but not for those who act to exclude themselves from the Class in the manner further described below.

WHY IS THERE A SETTLEMENT?

The Court did not decide in favor of Plaintiffs, the Settlement Class or Defendant Cell-Tek. Instead, the parties have agreed to a settlement. This avoids the cost, risk, and delay of further litigation. Under the settlement, Settlement Class Members will have the opportunity to obtain a payment in exchange for giving up certain legal rights. The Class Representatives and the attorneys think the Settlement is in the best interests of all Settlement Class Members.

WHAT DOES THE SETTLEMENT PROVIDE?

The total amount of the Settlement Fund is \$1,800,000. The lawyers who brought this lawsuit (listed on the following page and referred to as “Class Counsel”) will ask the Court to award them one-third of the Settlement Fund and actual costs, for the substantial time and effort they put into this case over the past few years. Class Representative, Milford & Ford, will apply to the Court for payment of \$15,000 in recognition of its service to the Settlement Class. Class Representative D. Michael Collins will request \$3,000 for his services. Any amount awarded will be paid from the Settlement Fund. The Settlement Fund will also cover costs associated with notice and administration of the settlement. These costs include the cost of mailing this Notice, as well as, the costs of administering the Settlement Fund. Attorneys’ fees, service payments, and the expenses of notice and administration will be deducted from the Settlement Fund before the balance is divided and distributed to members of the Settlement Class.

HOW MUCH WILL I BE PAID?

If the Court approves the settlement, every Settlement Class Member who submits a timely and valid Claim Form will be entitled to an equal payment from the Settlement Fund. The amount of your payment will depend on how many Settlement Class Members return Claim Forms. The maximum amount you will receive is \$500.

HOW CAN I GET A PAYMENT?

To qualify for a payment, you must send in a complete and timely Claim Form. A Claim Form is enclosed with this Notice. You also may obtain a Claim Form at CellTekJunkFaxSettlement.com.

Please complete the Claim Form, sign it, and mail it to the address listed on the Claim Form postmarked no later than **July 1, 2011**. You also may fax the Claim Form to the Settlement Administrator at 1-414-961-7427, or e-mail the Claim Form to the Settlement Administrator at info@CellTekJunkFaxSettlement.com. If you fax or e-mail the Claim Form, you must do so no later than midnight, U.S. Eastern Standard Time on **July 1, 2011**. If you do not return the Claim Form or if you return it late, you will not get a payment.

WHEN WILL I BE PAID?

If the Court approves the settlement, you will be paid as soon as possible after the court order becomes final. If there is an appeal of the settlement, payment may be delayed. The Settlement Administrator will provide information and updates about the timing of payment, as this information becomes available, at CellTekJunkFaxSettlement.com.

WHO REPRESENTS THE SETTLEMENT CLASS?

The attorneys who have been appointed by the Court to represent the Settlement Class are:

Edward A. Broderick, Esq. THE LAW OFFICE OF EDWARD A. BRODERICK 727 Atlantic Avenue, Second floor Boston, MA 02111	Matthew P. McCue, Esq. THE LAW OFFICE OF MATTHEW P. MCCUE 340 Union Avenue Framingham, MA 01702
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WHAT ARE MY OPTIONS?

Your choices are to:

(1) **Accept the settlement.** To accept the settlement, send in a complete and timely Claim Form. A Claim Form is enclosed with this Notice. You also may obtain a Claim Form at CellTekJunkFaxSettlement.com. If the settlement is approved, a check will be mailed to you. If you change your address, or your address has changed from the address to which this notice was sent, please inform the Settlement Administrator at the address below; OR

(2) **Exclude yourself.** You may “opt out” and exclude yourself from the settlement. If you opt out, you will not receive any cash payment, and you will not release any claims you may have against Cell-Tek. If you opt out, you will be free to pursue whatever legal rights you may have by pursuing your own lawsuit against Cell-Tek at your own risk and expense. To opt out from the settlement, you must mail a signed letter to the Settlement Administrator (address on the following page) postmarked by **July 1, 2011**, stating your name, address and telephone number, the name and case number of the case, and that you have made the decision to exclude yourself from the settlement; OR

(3) **Object to the settlement.** If you object to the settlement, submit your objection in writing to the Clerk of the Court of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, MA 02210, postmarked by **July 1, 2011**, stating your objection in *Milford & Ford Associates, Inc. and D. Michael Collins v. Cell-Tek, LLC*, Civil Action No. 1:09-cv-11261-DPW. You must also send a copy of your objection to the Settlement Administrator at the address on the following page, also by postmarked by **July 1, 2011**. Any objection to the proposed settlement must be a complete written statement of all grounds for the objection, together with factual and legal support for the stated objection. A member of the Settlement Class may appear at the Final Approval Hearing in person or through counsel to show cause why the proposed settlement should not be approved as fair, reasonable, and adequate. Attendance at the hearing is not necessary; however, persons wishing to be heard orally in

opposition to the approval of the settlement and/or the request for attorneys' fees and/or the request for compensation awards to the class representatives are required to indicate in their written objection their intention to appear at the hearing, and must offer a complete statement of grounds for the objection, together with all factual and legal authority for the stated objection, and state the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the Final Approval Hearing. Objections must also state the name, address, telephone number and signature of the objector.

WHAT RIGHTS AM I GIVING UP IN THIS SETTLEMENT?

If the Court gives final approval to the Settlement, Members of the Settlement Class will be deemed to have released their rights to sue or continue a lawsuit against Cell-Tek and others related to past fax transmissions by or on behalf of Cell-Tek that allegedly violate state or federal law. Giving up your legal claims is called a release.

WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Final Approval Hearing (the "Hearing") at 3:30 p.m. on August 16, 2011. The Hearing will be held at the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210. At the Hearing, the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court will hear objections to the settlement, if any. At the Hearing, the Court will also decide how much to pay Class Counsel. After the Hearing, the Court will decide whether to approve the Settlement. It is not known how long the Court will take to make its decision. In addition, the Hearing may be continued at any time by the Court without further notice to you. If the Court does not approve the settlement, or if it approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will not be paid at this time and the case will continue. The parties may negotiate a different settlement or the case may go to trial.

DO NOT ADDRESS QUESTIONS ABOUT THE SETTLEMENT OR THE LAWSUIT TO THE CLERK OF THE COURT OR TO THE JUDGE. INSTEAD, PLEASE DIRECT QUESTIONS TO:

**CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATOR
c/o A.B. DATA, LTD.
POST OFFICE BOX 170500
MILWAUKEE, WI 53217-8042**

Toll-Free 1-800-331-8642

DATED: MARCH 16, 2011

CLAIM FORM

*Milford & Ford Associates, Inc. and
D. Michael Collins v. Cell-Tek, LLC,*
Civil Action No. 1:09-cv-11261-DPW

<NOTICE ID NUMBER>
<NOTICE ID BARCODE>
<ORGANIZATION>
<FIRST NAME > <LAST NAME>, <TITLE>
<STREET>
<CITY> <STATE> <ZIP >

Fax Number: <FAX >



PROOF OF CLAIM FOR RECIPIENTS OF FAX ADVERTISEMENTS

You have received Notice of Settlement of Class Action because phone records obtained during the course of litigation indicate that the facsimile number indicated above, may have been used by you or your company in November of 2007, and that the fax number was used to transmit to you or your company an unsolicited facsimile advertisement from a business identified as "Cell-Tek," in alleged violation of the federal Telephone Consumer Protection Act. As a result, you or your company may be entitled to receive a settlement payment of up to \$500. To receive a payment from the Settlement Fund, you must complete and return this Claim Form.

Please complete the Claim Form, including all information on the reverse of this page, sign it, and return it by one of the following methods:

1. By mail to the Settlement Administrator, postmarked no later than **July 1, 2011**, at the following address:

**CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATOR
c/o A.B. DATA, LTD.
POST OFFICE BOX 170500
MILWAUKEE, WI 53217**

2. By fax to the Settlement Administrator at 1-414-961-7427 no later than midnight, U.S. Eastern Standard Time, on **July 1, 2011**.
3. By e-mail to the Settlement Administrator at info@CellTekJunkFaxSettlement.com no later than midnight, U.S. Eastern Standard Time, on **July 1, 2011**. If you use e-mail, you must send the Claim Form in a format that includes a legible signature.

PLEASE PROVIDE THE FOLLOWING INFORMATION FOR THE CLAIMANT:

LAST NAME OR NAME OF COMPANY:

FIRST NAME:

STREET ADDRESS:

CITY:

STATE:

ZIP CODE:

PHONE NUMBER (at which we may reach you if we have questions):

Did you or your company use the fax number listed in the top-right corner on the first page of this Claim Form on or around November 2007?

YES _____ NO _____

Claimant's Signature: _____

Date: _____

IF YOU HAVE ANY QUESTIONS CONCERNING THIS CLAIM FORM, YOU MAY CALL FOR ASSISTANCE AT 1-800-331-8642.

**CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATOR
c/o A.B. DATA, LTD.
POST OFFICE BOX 170500
MILWAUKEE, WI 53217-8042**

Exhibit C

CLAIM FORM

*Milford & Ford Associates, Inc. and
D. Michael Collins v. Cell-Tek, LLC,
Civil Action No. 1:09-cv-11261-DPW*

#NOTICEIDNUMBER#

#ORGANIZATION#

#FIRSTNAME# #LASTNAME#, #TITLE#

#STREET#

#CITY# #STATE# #ZIP#

Fax Number: #FAX#

For Official Use Only

IMPORTANT NOTE: ALL CLASS MEMBERS ARE TO RECEIVE DIRECT MAIL NOTICE AND FAX NOTICE PER THE COURT'S PRELIMINARY APPROVAL ORDER. IF YOU HAVE ALREADY SUBMITTED A CLAIM FORM IN THIS MATTER, IT IS NOT NECESSARY TO SUBMIT ANOTHER. YOU MAY CALL THE SETTLEMENT ADMINISTRATOR AT 1-800-331-8642 WITH ANY QUESTIONS.

PROOF OF CLAIM FOR RECIPIENTS OF FAX ADVERTISEMENTS

You have received Notice of Settlement of Class Action because phone records obtained during the course of litigation indicate that the facsimile number indicated above, may have been used by you or your company in November of 2007, and that the fax number was used to transmit to you or your company an unsolicited facsimile advertisement from a business identified as "Cell-Tek," in alleged violation of the federal Telephone Consumer Protection Act. As a result, you or your company may be entitled to receive a settlement payment of up to \$500. To receive a payment from the Settlement Fund, you must complete and return this Claim Form.

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LAST NAME OR NAME OF COMPANY:

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CITY:

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ZIP CODE:

PHONE NUMBER (at which we may reach you if we have questions):

Did you or your company use the fax number listed in the top-right corner on the first page of this Claim Form on or around November 2007?

YES _____ NO _____

Claimant's Signature: _____

Date: _____

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**CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATOR
c/o A.B. DATA, LTD.
POST OFFICE BOX 170500
MILWAUKEE, WI 53217-8042**

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MILFORD & FORD ASSOCIATES, INC.,
and D. MICHAEL COLLINS,

Class Action Plaintiffs

v.

C.A. NO. 1:09-CV-11261-DPW

CELL-TEK, LLC,

Defendant and Third-Party Plaintiff

v.

ERIE INSURANCE EXCHANGE, L. STEIN
CO. INC. d/b/a FAXVANTAGE, LEONARD
(LENNY) STEIN, individually, and
UNIXUSA, LLC

Third Party Defendants.

**THIS NOTICE CONCERNS SETTLEMENT OF A CLASS ACTION WHICH MAY ENTITLE
YOU TO RECEIVE A PAYMENT FROM SETTLEMENT FUND**

*By order of the Honorable Douglas P. Woodlock, Judge of the
United States District Court
for the District of Massachusetts*

WHY AM I GETTING THIS NOTICE?

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THIS IS NOT NOTICE OF A LAWSUIT AGAINST YOU.

The purpose of this Notice is to advise you of a proposed settlement of a class action lawsuit against Cell-Tek, LLC in the United States District Court for the District of Massachusetts. This Notice describes the case in general and does not address all of the issues in detail. You may review the case file at the office of the Clerk of the Court of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210. You may inspect the file and copy it at your expense, you may contact the Settlement Administrator at the toll-free telephone number 1-800-331-8642, or you may view and download a copy of the Stipulation of Class Action Settlement at CellTekJunkFaxSettlement.com.

WHAT IS THIS LAWSUIT ABOUT?

The lawsuit alleges that Cell-Tek violated the federal Telephone Consumer Protection Act, 47 U.S.C. §227 (“TCPA”), by sending out an unsolicited facsimile advertisement offering its goods or services in November 2007. The case seeks damages for class members consisting of those to whom the fax was allegedly transmitted. Cell-Tek denies that it violated any laws or that it did anything wrong. Cell-Tek has agreed to the settlement solely to avoid the burden, expense, risk and uncertainty of continuing the lawsuit. The Court has preliminarily certified this matter as a class action for settlement and has ordered that Class members be notified of the proposed settlement. Cell-Tek’s records reflect that you may be a Class member. The Class consists of:

All persons or entities within the United States to whom Cell-Tek, in or about November of 2007, sent or caused to be sent the facsimile advertisement identical in substance to the Cell-Tek Fax attached to the Class Complaint.

WHY IS THIS A CLASS ACTION?

In a class action, one or more people or entities, called “class representatives” (in this case, Milford & Ford Associates, Inc. and D. Michael Collins), sue on behalf of people who have similar claims. All of these people together are a “class” or “class members.” The settlement, if approved by the Court, resolves the issues for all members of the Class (the “Settlement Class Members”), but not for those who act to exclude themselves from the Class in the manner further described below.

WHY IS THERE A SETTLEMENT?

The Court did not decide in favor of Plaintiffs, the Settlement Class or Defendant Cell-Tek. Instead, the parties have agreed to a settlement. This avoids the cost, risk, and delay of further litigation. Under the settlement, Settlement Class Members will have the opportunity to obtain a payment in exchange for giving up certain legal rights. The Class Representatives and the attorneys think the Settlement is in the best interests of all Settlement Class Members.

WHAT DOES THE SETTLEMENT PROVIDE?

The total amount of the Settlement Fund is \$1,800,000. The lawyers who brought this lawsuit (listed on the following page and referred to as “Class Counsel”) will ask the Court to award them one-third of the Settlement Fund and actual costs, for the substantial time and effort they put into this case over the past few years. Class Representative, Milford & Ford, will apply to the Court for payment of \$15,000 in recognition of its service to the Settlement Class. Class Representative D. Michael Collins will request \$3,000 for his services. Any amount awarded will be paid from the Settlement Fund. The Settlement Fund will also cover costs associated with notice and administration of the settlement. These costs include the cost of mailing this Notice, as well as, the costs of administering the Settlement Fund. Attorneys’ fees, service payments, and the expenses of notice and administration will be deducted from the Settlement Fund before the balance is divided and distributed to members of the Settlement Class.

HOW MUCH WILL I BE PAID?

If the Court approves the settlement, every Settlement Class Member who submits a timely and valid Claim Form will be entitled to an equal payment from the Settlement Fund. The amount of your payment will depend on how many Settlement Class Members return Claim Forms. The maximum amount you will receive is \$500.

HOW CAN I GET A PAYMENT?

To qualify for a payment, you must send in a complete and timely Claim Form. A Claim Form is enclosed with this Notice. You also may obtain a Claim Form at CellTekJunkFaxSettlement.com.

Please complete the Claim Form, sign it, and mail it to the address listed on the Claim Form postmarked no later than **July 1, 2011**. You also may fax the Claim Form to the Settlement Administrator at 1-414-961-7427, or e-mail the Claim Form to the Settlement Administrator at info@CellTekJunkFaxSettlement.com. If you fax or e-mail the Claim Form, you must do so no later than midnight, U.S. Eastern Standard Time on **July 1, 2011**. If you do not return the Claim Form or if you return it late, you will not get a payment.

WHEN WILL I BE PAID?

If the Court approves the settlement, you will be paid as soon as possible after the court order becomes final. If there is an appeal of the settlement, payment may be delayed. The Settlement Administrator will provide information and updates about the timing of payment, as this information becomes available, at CellTekJunkFaxSettlement.com.

WHO REPRESENTS THE SETTLEMENT CLASS?

The attorneys who have been appointed by the Court to represent the Settlement Class are:

Edward A. Broderick, Esq. BRODERICK LAW, P.C. 727 Atlantic Avenue, Second floor Boston, MA 02111	Matthew P. McCue, Esq. THE LAW OFFICE OF MATTHEW P. MCCUE 340 Union Avenue Framingham, MA 01702
---	--

WHAT ARE MY OPTIONS?

Your choices are to:

(1) **Accept the settlement.** To accept the settlement, send in a complete and timely Claim Form. A Claim Form is enclosed with this Notice. You also may obtain a Claim Form at CellTekJunkFaxSettlement.com. If the settlement is approved, a check will be mailed to you. If you change your address, or your address has changed from the address to which this notice was sent, please inform the Settlement Administrator at the address below; OR

(2) **Exclude yourself.** You may “opt out” and exclude yourself from the settlement. If you opt out, you will not receive any cash payment, and you will not release any claims you may have against Cell-Tek. If you opt out, you will be free to pursue whatever legal rights you may have by pursuing your own lawsuit against Cell-Tek at your own risk and expense. To opt out from the settlement, you must mail a signed letter to the Settlement Administrator (address on the following page) postmarked by **July 1, 2011**, stating your name, address and telephone number, the name and case number of the case, and that you have made the decision to exclude yourself from the settlement; OR

(3) **Object to the settlement.** If you object to the settlement, submit your objection in writing to the Clerk of the Court of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, MA 02210, postmarked by **July 1, 2011**, stating your objection in *Milford & Ford Associates, Inc. and D. Michael Collins v. Cell-Tek, LLC*, Civil Action No. 1:09-cv-11261-DPW. You must also send a copy of your objection to the Settlement Administrator at the address on the following page, also by postmarked by **July 1, 2011**. Any objection to the proposed settlement must be a complete written statement of all grounds for the objection, together with factual and legal support for the stated objection. A member of the Settlement Class may appear at the Final Approval Hearing in person or through counsel to show cause why the proposed settlement should not be approved as fair, reasonable, and adequate. Attendance at the hearing is not necessary; however, persons wishing to be heard orally in

opposition to the approval of the settlement and/or the request for attorneys' fees and/or the request for compensation awards to the class representatives are required to indicate in their written objection their intention to appear at the hearing, and must offer a complete statement of grounds for the objection, together with all factual and legal authority for the stated objection, and state the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the Final Approval Hearing. Objections must also state the name, address, telephone number and signature of the objector.

WHAT RIGHTS AM I GIVING UP IN THIS SETTLEMENT?

If the Court gives final approval to the Settlement, Members of the Settlement Class will be deemed to have released their rights to sue or continue a lawsuit against Cell-Tek and others related to past fax transmissions by or on behalf of Cell-Tek that allegedly violate state or federal law. Giving up your legal claims is called a release.

WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Final Approval Hearing (the "Hearing") at 3:30 p.m. on August 16, 2011. The Hearing will be held at the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210. At the Hearing, the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court will hear objections to the settlement, if any. At the Hearing, the Court will also decide how much to pay Class Counsel. After the Hearing, the Court will decide whether to approve the Settlement. It is not known how long the Court will take to make its decision. In addition, the Hearing may be continued at any time by the Court without further notice to you. If the Court does not approve the settlement, or if it approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will not be paid at this time and the case will continue. The parties may negotiate a different settlement or the case may go to trial.

DO NOT ADDRESS QUESTIONS ABOUT THE SETTLEMENT OR THE LAWSUIT TO THE CLERK OF THE COURT OR TO THE JUDGE. INSTEAD, PLEASE DIRECT QUESTIONS TO:

**CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATOR
c/o A.B. DATA, LTD.
POST OFFICE BOX 170500
MILWAUKEE, WI 53217-8042**

Toll-Free 1-800-331-8642

DATED: MARCH 16, 2011

Exhibit D

Milford v. Cell-Tek

	Name:	Fax Number:	Postmark Date:
1)	D-Star Engineering Corporation	203-925-7631	4/12/2011
2)	McLean Engineering Company, Inc.	229-985-2248	5/6/2011
3)	Lancaster Level-Flo, Inc.	717-653-9806	4/13/2011
4)	Maryland State Highway Administration		5/4/2011
5)	Clearwater Plumbing Inc	770-443-7249	5/5/2011
6)	Sun-Tastic Decks, Inc.	703-266-2116	4/28/2011
7)	Pickering, Corts & Summerson, Inc.	215-968-3649	4/28/2011
8)	Brian M Gaff	(781) 581-9134	6/25/2011
9)	Rinker Design Assoc	703-257-5443	6/27/2011
10)	Clean-Rite Services	910-592-4043	7/5/2011
11)	Marietta Gravity Water Company	717-426-7031	7/2/2011

Exhibit E



D-STAR Engineering Corporation

Research, Design and Development Services; Automotive, Aerospace and Propulsion Systems.

4 Armstrong Rd
Shelton, CT 06484 U.S.A

Phone: (203)925-7630
Fax: (203)925-7631

Cell-Tek - 45707

8638085



April 12, 2011

D-Star Engineering Corporation

4 Armstrong Rd

Shelton, CT 06484

Subject: Letter of Exclusion from Cell-Tek Class Action Settlement

APR 15 2011

To whom it may concern:

This letter is to confirm that D-STAR Engineering Corporation do not wish to participate in Cell-Tek class action settlement, C.A. No. 1:09-cv-11261-DPW, and do not wish to share in the Settlement Fund, or the benefits of any judgment or settlement that may be obtained in the future in this litigation.

Karla Fleming
Accounts Manager

2011/04/12 14:47:18 48 Delia S

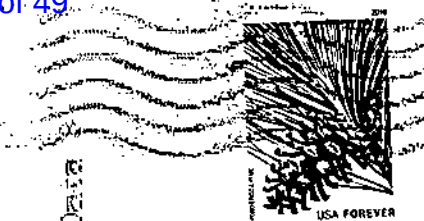


D-STAR ENGINEERING CORPORATION

4 Armstrong Road
Shelton, CT 06484 U.S.A.

SHELTON CT 06484

12 APR 2011 PM 3:11



APR 15 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, LTD
P.O. Box 170500
Milwaukee, WI 53217-8042

2011/04/15 14:47:14

53217+8042



MCLEAN ENGINEERING CO., INC.

P.O. Box 2587, 815 SOUTH MAIN, MOULTRIE, GA 31776/31768, (229) 985-1148

Cell-Tek - 45707

8638086



April 12, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B.Data, LTD.
PO Box 170500
Milwaukee, WI 53217

MAY 06 2011

Reference: Milford & Ford Associates, Inc. and
D. Michael Collins v. Cell-Tek, LLC,
Civil Action No. 1:09-cv-11261-DPW

McLean Engineering Company, Inc.
Fax No. 229-985-2248
Telephone No. 229-985-1148

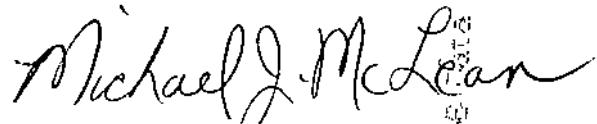
Dear Administrator:

In regards to the above referenced claim, we have made the decision to exclude ourselves from the settlement.

If there are any questions, please call.

Yours truly,

McLean Engineering Company, Inc.



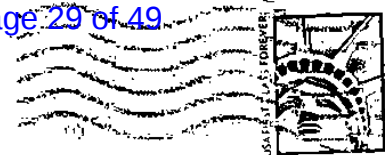
Michael J. McLean, PE. President

ec

McLEAN ENGINEERING CO., INC.

EIGHT FIFTEEN SOUTH MAIN / MOULTRIE, GEORGIA 31768

APR 22 2011 PM 2 T



APR 22 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B.Data, LTD.
PO Box 170500
Milwaukee, WI 53217

20110605 18:25:56

53217+8042





Lancaster Level-Flo, Inc.
25 Eby Chiques Road
Mount Joy, PA 17552
(717) 653-2239
Fax (717) 653-9806

Cell-Tek - 45707

8638087



Website: www.lancasterlevel-flo.com
www.lancasterdomes.com
E-mail: info@lancasterlevel-flo.com

April 12, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A. B. Data, LTD.
P. O. Box 170500
Milwaukee, WI 53217-8042

RE: C. A. NO. 1:09-CV-11261-DPW

MAY 06 2011

To Whom It May Concern:

In response to your notice dated March 16, 2011 referencing a class action against Cell-Tek, LLC, I have made the decision to exclude Lancaster Level-Flo, Inc. from this settlement.

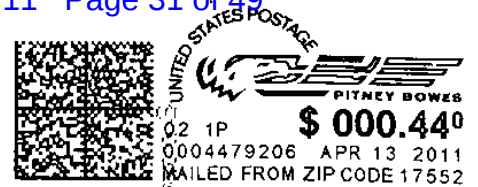
Sincerely,

A handwritten signature in black ink, appearing to read "K. Musser", written over a horizontal line.

Kenneth D. Musser
President



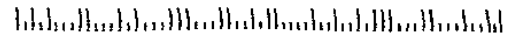
25 Eby Chiques Road
Mount Joy, PA 17552 USA



Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, LTD
PO Box 170500
Milwaukee, WI 53217-8042

APR 22 2011

532178042 8050





Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor

State Highway
Administration

Beverley K. Swaim-Staley, Secretary
Neil J. Pedersen, Administrator

MARYLAND DEPARTMENT OF TRANSPORTATION

Cell-Tek - 45707

8638088



April 26, 2001

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, LTD
P.O. Box 170500
Milwaukee, WI 53217-8042

MAY 06 2011

Re: Opt Out of Settlement

Dear Settlement Administrator;

I have decided to exclude myself from the settlement.

Name: Dave Smith (Manager Highway Maintenance)
Address: 150 Wyndtryst Dr., Westminster, MD 21157-4305
Telephone Number: (410) 876-2061

Name and Case Number: Milford & Ford Associates, Inc. and
D. Michael Collins
vs.
Cell-Tek, LLC, et al

In US District Court of Massachusetts
C.A. NO. 1:09-CV-11261-DPW

Very truly yours,

A handwritten signature in cursive script that reads "Dave Smith".

Dave Smith

My telephone number/toll-free number is _____

Maryland Relay Service for Impaired Hearing or Speech 1.800.735.2258 Statewide Toll Free

Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 • Phone 410.545.0300 • www.roads.maryland.gov

05/06 13:03:27 AB Data



MAY 06 2011

from the desk of

MICHAEL P. KENNEY

Assistant Attorney General

410-545-0064

Received

APR 29 2011

State Highway Administration
Westminster Group

4/26/11

Dave -

*Please sign this "opt out"
letter + put it in the
envelope to mail to the
Settlement Administrator.*

2011/05/05 10:41:12 AM Data 3

Any questions, please call me.

MPK



MARYLAND DEPARTMENT
OF TRANSPORTATION
P.O. Box 717 Baltimore, Maryland 21203-0717

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, LTD.
Post Office Box 170500
Milwaukee, WI 53217-8042

2011/05/08 13:06:29 AB Data 9



53217+8042



8638089



CLEARWATER PLUMBING INC
209 COMMERCE DRIVE SUITE A
DALLAS, GEORGIA 30132
770-443-4860

May 02, 2011

CELL-TEK CLASS ACTION SETTLEMENT
SETTLEMENT ADMINISTRATION
C/O A.C. DATE.LTD
POST OFFICE BOX 170500
MILWAUKEE, WI 53217-8042

MAY 12 2011

CASE # 1:09 CV-11261-DPW

WE WOULD LIKE TO OPT OUT AND EXCLUDE OURSELVES FROM THE
SETTLEMENT

A handwritten signature in black ink that reads "Gene Pace". The signature is written in a cursive, flowing style.

GENE PACE
PRESIDENT

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MILFORD & FORD ASSOCIATES, INC.,
and D. MICHAEL COLLINS,

Class Action Plaintiffs

v.

C.A. NO. 1:09-CV-11261-DPW

CELL-TEK, LLC,

Defendant and Third-Party Plaintiff

v.

ERIE INSURANCE EXCHANGE, L. STEIN
CO. INC. d/b/a FAXVANTAGE, LEONARD
(LENNY) STEIN, individually, and
UNIXUSA, LLC

Third Party Defendants.

MAY 1 2 2011

**THIS NOTICE CONCERNS SETTLEMENT OF A CLASS ACTION WHICH MAY ENTITLE
YOU TO RECEIVE A PAYMENT FROM SETTLEMENT FUND**

*By order of the Honorable Douglas P. Woodlock, Judge of the
United States District Court
for the District of Massachusetts*

WHY AM I GETTING THIS NOTICE?

Records obtained in this case indicate that in November of 2007, an unsolicited facsimile advertisement was transmitted to you, or your company, by a company identified as "Cell-Tek," in alleged violation of the federal Telephone Consumer Protection Act (TCPA). If you, or your company, used the facsimile number listed on the first page of the enclosed Claim Form, in November of 2007, you may be entitled to a recovery of up to \$500. To file a claim you need only fill out the enclosed Claim Form and mail, fax or e-mail it back to the identified Settlement Administrator. The deadline to file a claim by mailing back the Claim Form is **July 1, 2011**.

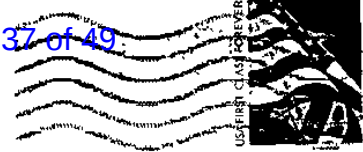
THIS IS NOT NOTICE OF A LAWSUIT AGAINST YOU.

The purpose of this Notice is to advise you of a proposed settlement of a class action lawsuit against Cell-Tek, LLC in the United States District Court for the District of Massachusetts. This Notice describes the case in general and does not address all of the issues in detail. You may review the case file at the office of the Clerk of the Court of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210. You may inspect the file and copy it at your expense, you may contact the Settlement Administrator at the toll-free telephone number 1-800-331-8642, or you may view and download a copy of the Stipulation of Class Action Settlement at CellTckJunkFaxSettlement.com.

CLEARWATER PLUMBING, INC.
209 Ste A Commerce Dr.
Dallas, GA 30132
770-443-4860

NORTH METRO, GA 300

05 MAY 2011 PM 1 T



MAY 12 2011

Cell-Per Class Action Settlement
Settlement Administration
c/o A.B. Data LTD
P.O. Box 170500

532173234 Milwaukee WI 53217 8042



PICKERING, CORTS & SUMMERSON, INC.

CONSULTING ENGINEERS, LAND SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS

Cell-Tek - 45707

8638090



April 28, 2011

Cell-Tek Class Action Settlement

Settlement Administrator

c/o A.B. Data, Ltd.

PO Box 170500

Milwaukee, WI 53217

**RE: Milford & Ford Associates, Inc. and
D. Michael Collins v. Cell-Tek, LLC,
Civil Action No. 1:09-CV-11261-DPW**

MAY 02 2011

Dear Sir:

On behalf of Pickering, Corts & Summerson, Inc., of 642 Newtown-Yardley Road, Suite 300, Newtown, PA 18940, has made the decision to exclude ourselves from the settlement civil action no. 1:09-CV-11261-DPW.

Your attention in this matter is greatly appreciated.

Regards,

PICKERING, CORTS & SUMMERSON, INC.

Paul M. Gouza,
Director of Operations

PMG: dl

Cc: John A. Prybella, President
File

X:\Admin P.Gouza\ltr Cell Tek Civil Action dtd 4_28_11.doc

PICKERING, CORTS & SUMMERSON, INC.

Consulting Engineers, Land Surveyors, Planners & Landscape Architects
642 Newtown-Yardley Road • Suite 300 • Newtown, PA 18940



UNITED STATES POSTAGE
PITNEY BOWES
02 1P
\$ 000.44⁰
0004149221 APR 28 2011
MAILED FROM ZIP CODE 18940

MAY 02 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, Ltd.
PO Box 170500
Milwaukee, WI 53217

5321738042



8638091



Sun-Tastic Decks, Inc.
and other fine home improvements

April 27, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, Ltd.
Post Office Box 170500
Milwaukee, WI 53217

To Whom It May Concern,

This serves as notice that Sun-Tastic Decks, Inc. wants to be excluded from the Cell-Tek LLC Class Action Settlement (Case No. 1:09-CV-11261-DPW).

The office address is 14817 Hickory Post Ct., Centreville, VA 20121 and telephone number is 703-266-1181.

MAY 02 2011

Sincerely,

Carl J. Unterkofler, President
Sun-Tastic Decks, Inc.
14817 Hickory Post Ct.
Centreville, VA 20121

Sun-Tastic Decks, Inc.
Carl J. Unterkofler, Pres.
14817 Hickory Post Ct.
Centreville, VA 20121

NO VA 200

25 APR 2011 PM 5:11



MAY 02 2011

Cell-Tek Class Action Settlement
Administrator
c/o A.B. Data, Ltd.
P.O. Box 170500
Milwaukee, WI 53217

33217+8042



BRIAN M. GAFF, ESQ.

Cell-Tek - 45707

8638092



JUN 28 2011

June 24, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, Ltd.
P.O. Box 170500
Milwaukee, WI 53217-8042

RE: Milford & Ford Assoc. v. Cell-Tek, LLC
Case No. 1:09-cv-11261-DPW (D. Mass.)

To Whom It May Concern:

Please be advised that pursuant to Fed. R. Civ. P. 23, I hereby request exclusion from, and exclude myself from, the class defined and certified in the above-referenced action.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian M. Gaff".

Brian M. Gaff

P.O. Box 166
Swampscott, MA 01907-0266



\$0.440
US POSTAGE
FIRST-CLASS
FROM 01907
JUN 25 2011
stamps.com



0625000352264



Cell-Tek Class Action Settlement
Settlement Administrator
c/o A B Data, Ltd.
P.O. Box 170500
Milwaukee WI 53217-8042





RINKER DESIGN ASSOCIATES, P.C.

Engineering • Surveying • Land Planning
Transportation • Environmental

Cell-Tek - 45707

JUN 29 2011

8638093



June 21, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
C/O A. B. Data, LTD.
P. O. Box 170500
Milwaukee, WI 53217-8042

Re: *Milford & Ford Associates, Inc and D Michael Collins v Cell-Tek, LLC*, Civil
Action No 1:09-cv-11261-DPW

To Whom It May Concern:

Please exclude me from the class action settlement for *Milford & Ford Associates, Inc and D Michael Collins v. Cell-Tek, LLC*, Civil Action No 1:09-cv-11261-DPW

Sincerely,

Edward B. Snider, Jr., P.E.
President

RINKER DESIGN ASSOCIATES, PC



www.rdacivil.com

Edward B. Snider, Jr., P.E.
President

9300 West Courthouse Road
Suite 300
Manassas, VA 20110



UNITED STATES POSTAGE
PITNEY BOWES
02 1P
0004483401 JUN 27 2011
\$ 000.44⁰
MAILED FROM ZIP CODE 20110

Cell-Tek Class Action Settlement
Settlement Administrator
C/O A. B. Data, LTD.
P. O. Box 170500
Milwaukee, WI 53217-8042

53217+8042



Cell-Tek 45787
8638094



CLEAN-RITE SERVICES, INC
1404 Hobbton Highway
Post Office Box 691
Clinton, North Carolina 28329
Telephone 910 592-4731
Fax 910 592-4043

June 27, 2011

Cell-Tek Class Action Settlement
Settlement Administrator
C/o A B Data Ltd
Post Office Box 170500
Milwaukee, WI. 53217

To Settlement Administrator

Re. Claim Form Milford & Ford Associates, Inc. and
D Michael Collins v Cell-Tek, LLC,
Civil Action No 1:09-cv-11261-DPW

I would like to exclude myself and Clean-Rite Services, Inc
from the Cell-Tek Class Action Settlement

CLEAN-RITE SERVICES, INC

Ronnie Warren, Owner

CLEAN-RITE SERVICES, INC.

P. O. Box 691

Clinton, North Carolina 28329-0691



Cell-Tek Class Action Settlement
Settlement Administrator
c/o A.B. Data, Ltd.
Post Office Box 170500
Milwaukee, WI. 53217

MARIETTA GRAVITY WATER COMPANY

1195 RIVER ROAD, P. O. BOX 302
MARIETTA, PENNSYLVANIA 17547-0302

(717) 426-7040
Fax (717) 426-7031

Cell-Tek - 45707

JUL 05 2011

8638095



June 30, 2011

Settlement Administrator
Cell-Tek Class Action Settlement
c/o A.B. Data, Ltd
P.O. Box 170500
Milwaukee, WI 53217

Re *Milford & Ford Associates, Inc. v. CELL-TEK, LLC v. ERIE Insurance Exchange, et al.*
C.A. No. 1:09-CV-11261-DPW

"OPT OUT" BY MARIETTA GRAVITY WATER COMPANY

Dear Sir or Madam,

Please accept this letter as our notice that we have determined to OPT OUT from the class and from the settlement of the above-referenced action.

If you have any questions, you may reach me at 717 426.1931.

Sincerely,

MARIETTA GRAVITY WATER COMPANY

By 

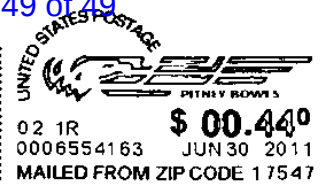
Donald H. Nikolaus
President

MARIETTA GRAVITY WATER CO.

1195 RIVER ROAD

PO BOX 302

MARIETTA, PA 17547-0302



Settlement Administrator
Cell-Tek Class Action Settlement
c/o A.B. Data, Ltd.
P.O. Box 170500
Milwaukee, WI 53217

53217#8042 B050

